

- June 1, 2011 Declaration of Karyl Van Tassel, which is filed at Doc. 616 in this Court in Case No. 3:09-CV-0724-N;
- June 2, 2011 Declaration of Karyl Van Tassel, which is filed at Doc. 616 in this Court in Case No. 3:09-CV-0724-N;
- June 7, 2011 Declaration of Karyl Van Tassel, which is filed at Doc. 616 in this Court in Case No. 3:09-CV-0724-N;
- October 12, 2011 Declaration of Karyl Van Tassel, which is filed at Doc. 784 in this Court in Case No. 3:09-CV-0724-N;
- February 25, 2015 Declaration of Karyl Van Tassel, which is which is included in the KMVANTASSEL production at KMVANTASSEL_0076361-KMVANTASSEL_00076507;
- August 4, 2015 Declaration of Karyl Van Tassel, which is included in the KMVANTASSEL production at KMVANTASSEL_0092078-KMVANTASSEL_01002270;
- April 30, 2018 Supplemental Declaration of Karyl Van Tassel (“Supplemental Declaration”), which is being produced to Defendants hereto. The April 30, 2018 Supplemental Declaration is attached hereto as **Exhibit 1**; the Appendix containing all exhibits referenced therein is being produced via File Transfer Protocol (FTP) contemporaneously with these documents.

The Receiver expressly reserves the right to supplement this disclosure.

(ii) The facts or data considered by the witness in forming them;

The facts and data considered by Karyl Van Tassel in forming her opinions are contained in the April 30, 2018 Supplemental Declaration of Karyl Van Tassel and the exhibits referenced therein, as well as the following:

- The Receiver’s Complaints in this Lawsuit;
- Transaction detail and account information from SIB’s Tenemos and DataPro CD databases;
- The Stanford Investor General production (STAN INVSTR GENL 000001 through STAN INVSTR GENL 140984), which will be provided on request to the extent that it has not been provided;

- The KMVANTASSEL production (KMVANTASSEL_0000001 through KMVANTASSEL_0132251), which will be provided on request to the extent that it has not been provided;
- The STAN BROKER production (STAN BROKER 0000001 - STAN BROKER 0044335), which will be provided on request to the extent that it has not been provided;
- Karyl Van Tassel's workpapers, which will be served contemporaneously via FTP with this report, and produced with bates numbers in the next few days;
- The exhibits referenced in the April 30, 2018 Supplemental Declaration of Karyl Van Tassel, which will be produced to Defendants via File Transfer Protocol (FTP) contemporaneously with these documents and, to the extent not already done prior, produced with bates numbers in the next few days; and
- The list of documents considered attached hereto as **Exhibit 2**.

The Receiver reserves the right to supplement this disclosure.

(iii) Any exhibits that will be used to summarize or support them;

The Receiver may use the documents referenced in or attached to the Van Tassel Opinions or otherwise produced to Defendants. The Receiver reserves the right to supplement this disclosure.

(iv) The witness's qualifications, including a list of all publications authored in the previous 10 years.

Ms. Van Tassel's qualifications are set forth in exhibit KVT-1 to the April 30, 2018 Supplemental Declaration of Karyl Van Tassel, which is attached hereto as Exhibit 1. The Receiver reserves the right to supplement this disclosure.

(v) A list of all other cases in which, during the previous 4 years, the witness testified as

an expert at trial or by deposition;

Ms. Van Tassel's testifying experience is set forth in Exhibit KVT-1 to the April 30, 2018 Supplemental Declaration of Karyl Van Tassel, which is attached hereto as Exhibit 1. The Receiver reserves the right to supplement this disclosure.

(v) A statement of the compensation to be paid for the study and testimony in the case;

Ms. Van Tassel is being compensated for her work on an hourly basis at the rate of \$520.00 per hour. This hourly rate does not exclude amounts subject to the Court's holdback order [*See* Case No. 3:09-CV-0298-N, Doc. 1565.].

The Receiver hereby reserves the right to supplement the foregoing disclosures pursuant to Federal Rule of Civil Procedure 26(e)(2).

Dated: April 30, 2018

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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**ATTORNEYS FOR RECEIVER
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CERTIFICATE OF SERVICE

On April 30, 2018, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve the parties individually or through their counsel of record, electronically, or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Kevin M. Sadler

Kevin M. Sadler